

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CHARLES JOSEPH FREITAG, JR., as ADMINISTRATOR of the ESTATE OF CHARLES JOSEPH FREITAG, SR.,	:	
	:	
	:	
	:	
Plaintiff,	:	
	:	
v.	:	No. 2:19-cv-05750
	:	
BUCKS COUNTY et al.	:	
	:	
Defendants.	:	
	:	

JOINT STATUS REPORT

As directed in the Court's Order of August 10, 2022 (ECF 129), the parties submit the following report regarding their settlement:

Since the parties reached a settlement in principle, the parties have reached agreement on written settlement release documents, and plaintiff has executed those documents. Plaintiff has secured the assistance of estate counsel to ensure that the estate complies with all requirements under state law including the payment of any outstanding liens and proper allocations of settlement proceeds between the wrongful death and survival actions. Plaintiff anticipates filing in this Court a petition for formal approval of the settlement within the next 30 days.

Should plaintiff not be able to file a petition on or before October 3, 2022, the parties will submit another status report to advise as to the anticipated timing for that filing.

Respectfully submitted,

/s/ Jonathan H. Feinberg
Jonathan H. Feinberg

/s/ Grace Harris
Grace Harris

Kairys, Rudovsky, Messing,
Feinberg & Lin LLP
718 Arch Street, Suite 501 South
Philadelphia, PA 19106

Counsel for Plaintiff

/s/ Jeffrey M. Scott
Jeffrey M. Scott

/s/ Kerri E. Chewning
Kerri E. Chewning

Archer & Greiner P.C.
Three Logan Square
1717 Arch Street, Suite 3500
Philadelphia, PA 19103

Counsel for Defendant Bucks County

/s/ John R. Ninosky
John R. Ninosky

Marshall Dennehey Warner
Coleman & Goggin
100 Corporate Center Drive, Suite 201
Camp Hill, PA 17011

*Counsel for Defendants PrimeCare,
Mahoney, and Penge*

DATE: September 8, 2022